February 27, 2017

Randall J. Gould, District Ranger
Feather River Ranger District
Plumas National Forest
875 Mitchell Avenue
Oroville, CA 95965

In Reply To: Gibsonville Healthy Forest Restoration Project

Dear Mr. Gould:

The American Forest Resource Council (AFRC) provides the following comments on the Gibsonville Healthy Forest Restoration Project EA. AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Feather River Ranger District, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. In the California forest sector, 8.5 direct and indirect jobs are created per million board feet (mmbf) of timber harvested. These numbers include stump-to-mill and sawmill jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest products sector in that most manufacturing jobs are in wood manufacturing. The forest products sector is one of the few sources of stable living-wage employment in these communities.

AFRC is glad to see the Feather River Ranger District is proposing vegetation management projects that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public, and we appreciate the Plumas National Forest for contributing to this supply.

We support Alternative B (Proposed Action) because more acres are effectively treated to reduce the risk of wildfire and insect or disease infestation, and to protect, restore, and enhance forest ecosystem components. The following comments are submitted in support of the proposed action and implementation of economically efficient projects that will pay their way out of the woods.

1. Managing Stand Densities and Designing Economically Efficient Thinning Projects

An important objective of this project is to reduce the probability of large-scale tree mortality by reducing high stand densities. The Gibsonville project planning area has forest stand densities that exceed biological potential especially considering current drought conditions. Stand Density Index (SDI) as described in the EA is an excellent measure of stand stocking density and vigor and can be used to determine effective tree stocking densities over time to meet forest health objectives. To accomplish this, the project's thinning should be designed to ensure that stocking density does not exceed an upper limit of 60% of maximum SDI for at least the next 20 years. This approach has been widely used and was endorsed by former Regional Forester Jack Blackwell. See attached Regional Forester letter "Conifer Forest Density Management for Multiple Objectives, 7/14/2004."

The EA defines pre-and post-treatment percent of maximum stand density index (SDI) for each residual canopy cover class. Some of the stands in the 40% canopy cover retention class near roads may meet the 20-year standard. Each stand should be evaluated separately to determine effectiveness. As stated in the silviculture report, stand densities could again approach undesirable densities within 10 to 20 years after treatment.

AFRC recommends that silvicultural prescriptions be based on one thinning entry every 20 years which would reduce the number of entries over time and provide added assurance against future drought. Heavier thinning would meet forest health objectives, create conditions conducive to the regeneration and growth of shade intolerant species, and provide sufficient value (saw timber) for economically efficient projects.

The silviculture report states "For the Gibsonville project, stand density index (SDI) was not used in determining what level a stand should be thinned down to since trying to maintain a 40 or 50 percent canopy cover appears to be the limiting factor." The objective of the project is forest health restoration. Maintaining 40 or 50 percent canopy cover may be a limiting factor. However, when considering areas with restrictions on canopy reduction, long term benefits to forest health should be weighed against any short-term reductions in canopy closure.

2. Biomass Removal and Tree Mortality Map (Tier 1 and Tier 2 Areas)

Smaller material would be offered for sale as biomass, firewood or other small-log uses. Non-commercial trees could be cut, piled and burned, or brought to a landing to be chipped and removed as biomass. Commercial removal of this material is contingent on the area being identified as high hazard zones (HHZ) as defined by the CA Tree Mortality Task Force Website. The HHZ map drives biomass purchases for the next 5 years. Biomass from areas not on the map will be low priority or unavailable for purchase.

In 2017, regulation requires that 50% of biomass purchased must originate from a defined HHZ, 2018 requires 60%, and 2019 forward requires 80% from HHZ areas. The Forest needs to make sure the HHZ Map is updated at least every six months to include proposed projects. The current version was developed last year and should be updated. The District should focus future projects, as much as possible, in areas that are in the mapped HHZ Areas.

If the biomass planned for removal is not in an HHZ, and therefore unlikely to be purchased, the removal of the biomass should not be required under timber sale contracts; it should be subject to agreement.

3. Spotted Owl Surveys vs. Limited Operating Period (LOP)

Small projects like this are needed and will hopefully continue to become more common in the future. It is important to accelerate the pace of treatment as forest health continues to decline. Various LOPs have pushed some projects into multiple years, extending the length of time to complete because of the limited number of days available to operate.

LOPs need to be reduced when possible and should be as short and geographically limited as needed for resource protection. The Forest needs to consider using regular wildlife surveys over larger areas to possibly clear individual projects from needing to apply LOPs. This would speed up the process of getting acres treated.

The Forest should also explore take avoidance strategies to allow certain types of treatments during LOPs. The Fish & Wildlife Service has developed strategies for fisher in Washington and California that have proven effective.

4. Operating Restrictions

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the way these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service NEPA documents and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the area with a variety of skills and equipment. Developing a contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators to work on the

project. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. For example, in conjunction with cable harvesting on steeper slopes, there are opportunities to use certain ground equipment such as feller bunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller bunchers throughout these units can greatly increase its economic viability, and in some cases, decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

On September 22, 2016, there was a fieldtrip to the project area with AFRC members and Plumas National Forest personnel (see attached notes). AFRC members stated that limited and controlled equipment entry into aspen and meadow sites would cause less damage than requiring end-lining of trees. It has been proven that end-lining this material causes more damage that allowing equipment to enter these zones and remove the material. On EA page 26 it states "As long as requirements for resource protection are met, no restrictions are made on type of equipment used to get the work done." AFRC members also requested requiring biomass removable to landings then subject to agreement for removal. This is also included in the EA. These are steps in the right direction!

5. Canopy Cover vs. Canopy Closure

The treatments being proposed will likely affect spotted owl habitat to some degree. Often this level of effect is quantified by the amount of forest canopy that remains following thinning treatments. AFRC has general concerns with how the Forest Service and USFWS have been measuring these effects to spotted owl habitat, specifically regarding canopy cover/closure. Please see the attached document titled 'NSO Canopy Condition' as an addendum to these comments for consideration in how the treatments on this project are designed and how this design affects the spotted owl. Based on this extensive literature review, AFRC has concluded that canopy condition related to the effects on spotted owls should be measured using canopy closure rather than canopy cover.

6. Effects of Thinning on Spotted Owls

In addition to the affects to spotted owl habitat, this project may also have short-term effects to the spotted (based on the presence of actual owls) due to the assumption that any type of forest management activity, including those that maintain habitat types, will have a negative impact on owls and their prey. This assumption is typically based on a few scientific pieces of literature published over the past decade. We would like the Plumas National Forest to consider a recently published study conducted by NCASI when assessing treatment areas and their potential affects to owls:

Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, Paul Van Deusen. 2015. Forest ecosystem restoration: Initial response of spotted owls to partial harvesting

Among other findings, this study concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls.

7. Water Source Development

Water source development was also discussed at the September meeting. There is a need to develop water sources on the sale area for general road dust abatement as well as for fire suppression, under-burning and wildlife needs. We support and highly recommend that the District look at well developments that lessen the potential for yellow legged frog impacts as well as preserving water quality at stream locations. Well development and storage facilities sometimes cost less than trying to develop stream locations.

8. Socio Economics

The economic feasibility analysis report (table 6) shows that alternative C is economically unfeasible and the project would not pay its way out of the woods. Alternative C is less effective than alternative B and it may need to be subsidized with other funding sources. Please select alternative B (proposed action).

Thank you for the opportunity to comment. Please keep me informed as the project progresses.

Sincerely,

/s/*Scott Stawiarski*

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cc: AFRC
CFA

Enclosure